

BEFORE THE FEDERAL ELECTION COMMISSION

In the Matter of )  
 ) MUR 7272  
Party of Regions; European Centre for a )  
Modern Ukraine; Ina Kirsch; Rep. Steve )  
Chabot; Dana T. Rohrabacher; Edward )  
R. Royce; Sen. James E. Risch; Steve )  
Chabot for Congress and James )  
Schwartz, Sr. in his official capacity as )  
treasurer; Rohrabacher for Congress and )  
Jen Slater in her official capacity as )  
treasurer; Royce Campaign Committee )  
and Kelly Lawler in her official capacity )  
as treasurer; Jim Risch for U.S. Senate )  
Committee and R. John Insinger in his )  
official capacity as treasurer; DMP )  
International, LLC; Davis, Manafort and )  
Freedman; Mercury Public Affairs, LLC; )  
Mercury, LLC; Paul J. Manafort, Jr.; )  
John V. Weber; Edward S. Kutler; )  
Michael McSherry; Deirdre Stach; )  
Gregory M. Lankler )

CERTIFICATION

I, Laura E. Sinram, recording secretary of the Federal Election Commission executive session, do hereby certify that on May 09, 2019, the Commission took the following actions in the above-captioned matter:

1. Failed by a vote of 2-2 to:

- a. Find reason to believe that the Party of Regions, European Centre for a Modern Ukraine, and Ina Kirsch violated 52 U.S.C. §§ 30121, 30122 by making foreign national contributions in the name of another.

- b. Find reason to believe that Mercury Public Affairs, LLC; Mercury, LLC; and DMP International, LLC violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(h) by providing substantial assistance in the making of foreign national contributions.
- c. Take no action with respect to the allegations that Davis, Manafort and Freedman violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(h) by providing substantial assistance in the making of foreign national contributions.
- d. Find reason to believe that Paul J. Manafort, Jr., John V. Weber, Edward S. Kutler, Michael McSherry, Deirdre Stach, and Gregory M. Lankler violated 52 U.S.C. §§ 30121, 30122 and 11 C.F.R. § 110.20(h) by allowing their names to be used to effect foreign national contributions in the name of another.
- e. Take no action with respect to the allegations that Rep. Steve Chabot, Steve Chabot for Congress and James Schwartz, Sr. in his official capacity as treasurer, Dana T. Rohrabacher, Rohrabacher for Congress and Jen Slater in her official capacity as treasurer, Edward R. Royce, Royce Campaign Committee and Kelly Lawler in her official capacity as treasurer, Sen. James E. Risch, and Jim Risch for U.S. Senate Committee and R. John Insinger in his official capacity as treasurer may have violated 52 U.S.C. §§ 30121, 30122 by knowingly accepting foreign national contributions made in the name of another.
- f. Direct the Office of General Counsel to draft a Factual and Legal Analysis consistent with these findings.
- g. Authorize the compulsory process.
- h. Send the appropriate letters.

Commissioners Walther and Weintraub voted affirmatively for the motion.

Commissioners Hunter and Petersen dissented.

2. Failed by a vote of 2-2 to:

- a. Dismiss the allegations that the Party of Regions, European Centre for a Modern Ukraine, and Ina Kirsch violated 52 U.S.C. §§ 30121, 30122 by making foreign national contributions in the name of another.

- b. Dismiss the allegations that Mercury Public Affairs, LLC; Mercury, LLC; DMP International, LLC; and Davis, Manafort and Freedman violated 52 U.S.C. § 30121 and 11 C.F.R. § 110.20(h) by providing substantial assistance in the making of foreign national contributions.
- c. Dismiss the allegations that Paul J. Manafort, Jr., John V. Weber, Edward S. Kutler, Michael McSherry, Deirdre Stach, and Gregory M. Lankler violated 52 U.S.C. §§ 30121, 30122 and 11 C.F.R. § 110.20(h) by allowing their names to be used to effect foreign national contributions in the name of another.
- d. Dismiss the allegations that Rep. Steve Chabot, Steve Chabot for Congress and James Schwartz, Sr. in his official capacity as treasurer, Dana T. Rohrabacher, Rohrabacher for Congress and Jen Slater in her official capacity as treasurer, Edward R. Royce, Royce Campaign Committee and Kelly Lawler in her official capacity as treasurer, Sen. James E. Risch, and Jim Risch for U.S. Senate Committee and R. John Insinger in his official capacity as treasurer violated 52 U.S.C. §§ 30121, 30122 by knowingly accepting foreign national contributions made in the name of another.
- e. Approve the appropriate letters.
- f. Close the file.

Commissioners Hunter and Petersen voted affirmatively for the motion. Commissioners Walther and Weintraub dissented.

3. Decided by a vote of 4-0 to:

- a. Close the file.
- b. Send the appropriate letters.

Commissioners Hunter, Petersen, Walther, and Weintraub voted affirmatively for the decision.

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Laura E. Simon

**Deputy Secretary of the Commission**

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